

ORIGINAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN CLERK'S OFFICE  
U.S.D.C. - Atlanta

NOV 13 2015

JAMES N. DAYEN, Clerk  
By: *[Signature]*  
Deputy Clerk

Robert N. Beirne, Jr.,  
Plaintiff

v.

OCWEN LOAN SERVICING  
Defendant

CIVIL ACTION  
FILE NO: 1:15-cv-03630-LMM-GGB

**MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND  
TO DEFENDANTS MOTION TO DISMISS COMPLAINT**

COMES NOW, the Plaintiff, Robert N. Beirne, Jr., and pursuant to Local Rule 7.3 (a) and Rule 6, hereby submits this Motion for Extension time for Plaintiff to Respond to Defendants Motion to Dismiss Complaint (Doc. "4"), showing the Court as follows:

1. Defendant OCWEN LOAN SERVICING filed their Motion to Dismiss ("Doc. 4"), on October 21, 2015. Plaintiff was served October 30, 2015.

2. Pursuant to Rule 7.1B of the Local Rules for the Northern District of Georgia Plaintiff's response is currently due to be filed on or before November 13, 2015.

3. This motion is made on the grounds that such an extension of time is reasonable and necessary to afford Plaintiff an opportunity to plead to the Motion to Dismiss the Complaint.

4. Due to the Plaintiff being Pro Se, Plaintiff needs thirty (30) day extension in which to prepare the Plaintiff's Response in Opposition to the Defendants Motion to Dismiss the Complaint.

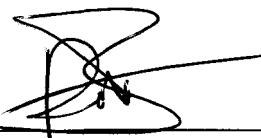
5. No previous extensions of the time for the Plaintiff to respond to the Motion to Dismiss have been sought nor granted. The Defendant will in no manner be prejudiced by this extension of time.

THEREFORE, for the foregoing reasons, the Plaintiff shows that this Court should grant the present Motion for Extension of Time and issue an Order providing that the Plaintiff shall have up to and including December 13, 2015 in

which to file Plaintiff's Response in Opposition to Defendants Motion to Dismiss the Complaint.

A proposed Order is attached hereto for the Court's convenience.

Respectfully submitted, this 10th day of November, 2015,

By:   
\_\_\_\_\_  
Robert N. Beirne, Jr.,  
Sui Juris in Propria Persona  
1511 Rocky Creek Drive  
Woodstock, GA 301889  
678-468-8300

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served upon all parties of record the within and foregoing **PLAINTIFFS MOTION FOR EXTENSION OF TIME** by placing a true and correct copy of same in the United States Mail Priority Mail 2<sup>nd</sup> day, with prepaid first-class postage affixed thereto, properly addressed as follows:

**Federal Court Northern District Atlanta**  
**FEDERAL BUILDING**  
Clerk of the Court  
75 Ted Turner Drive, South West,  
Atlanta, Georgia 30303

**Amy Lucy Hanna**  
Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C.-Atl  
Suite 1600, Monarch Plaza  
3414 Peachtree Street, NE  
Atlanta, GA 30326  
404-221-6507  
Fax: 404-221-6501  
Email: ahanna@bakerdonelson.com  
*ATTORNEY TO BE NOTICED*

Respectfully submitted, this 10th day of November, 2015,

By: \_\_\_\_\_

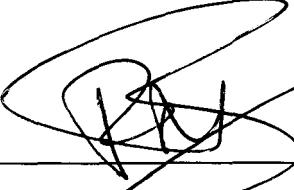
  
Robert N. Beirne, Jr.

**PLAINTIFF'S NOTICE OF MANUAL FILING**

Please take notice that Plaintiff has manually filed the following document or thing: **PLAINTIFFS MOTION FOR EXTENSION OF TIME.**

This document was not filed electronically because Plaintiff is excused from filing this document or thing electronically by Administrative Procedures For Filing, Signing and Verifying Pleadings and Papers By Electronic Means, Section III-B. The document or thing has been manually served on all parties.

Respectfully submitted, this 10th day of November, 2015,

By: \_\_\_\_\_  
  
Robert N. Beirne, Jr.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

Robert N. Beirne, Jr.,  
Plaintiff

v.

OCWEN LOAN SERVICING  
Defendant

CIVIL ACTION  
FILE NO: **1:15-cv-03630-LMM-GGB**

**ORDER EXTENDING THE TIME FOR PLAINTIFF TO RESPOND TO  
DEFENDANTS MOTION TO DISMISS COMPLAINT**

HAVING COME ON FOR CONSIDERATION, the Plaintiff's Motion for Extension Time for Plaintiff to Respond to Defendants Motion to Dismiss Complaint, and after due consideration and for good cause shown, the Court GRANTS Plaintiff's Motion requesting an additional thirty (30) days in which to file his response to the Motion to Dismiss the Complaint filed by the Defendant.

THEREFORE, IT IS HEREBY ORDERED that the time for the Plaintiff to file his Response in Opposition to the Defendants Motion to dismiss is extended for a period of thirty days, through and including December 13, 2015.

SO ORDERED this \_\_\_\_\_ day of November 2015

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Judge, United States District Court